



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**NEW ENGLAND – REGION 1**

5 Post Office Square, Suite 100

Mail Code OSRR07-4

Boston, MA 02109-3912

June 12, 2019

Chinny Esakkiperumal  
Olin Corporation  
3855 North Ocoee Street  
Suite 200  
Cleveland, TN 37312

Subject: Notice of Disapproval  
Final IRSWP Addendum - Plant B Continued OM&M Plan  
Olin Chemical Superfund Site, Wilmington, Massachusetts

Dear Mr. Esakkiperumal,

The U.S. Environmental Protection Agency (“EPA”) has reviewed the *Final IRSWP Addendum – Plant B continued OM&M Plan* submitted by Olin Corporation (“Olin”) under the Administrative Order on Consent for Remedial Investigation/Feasibility Study (“RI/FS AOC”) for the Olin Chemical Superfund Site (“Site”) on November 30, 2018, as amended on April 5, 2019 (the “Final IRSWP Addendum”).

EPA first reviewed and provided comments on the Final IRSWP Addendum in a letter dated March 21, 2019. Olin provided a written response to EPA’s comments in a letter dated April 5, 2019. EPA Specific Comment no.1 stated that Plant B also operates as a groundwater containment system for the dissolved-phased contaminants of potential concern (“COPCs”) including trimethylpentenes (“TMPs”), diphenyl-ether, n-nitrosodimethylamine (“NDMA”), and arsenic. Olin responded that, “shallow groundwater discharge to surface water in the East Ditch in the Plant B area will be evaluated as part of the OU1/OU2 feasibility study. If future groundwater discharge to East Ditch poses unacceptable risk to surface water, Olin will work with USEPA to determine an appropriate path forward.”

EPA received the OU1/OU2 draft feasibility study report (“OU1/OU2 draft FS”) on May 23, 2019. Appendix B of the OU1/OU2 draft FS contains an evaluation of the hypothetical discharge of COPCs to the East Ditch as the only impacted receptor should containment of groundwater from the operation of Plant B no longer exist. The evaluation concludes that no unacceptable ecological risk would result in the East Ditch.

Pursuant to Section X, Paragraph 40 of the RI/FS AOC, EPA disapproves the Final IRSWP Addendum, and specifically the Pump Rate Reduction Test (“PRRT”), based on the following facts:

1. EPA needs to closely review Olin's hypothetical discharge scenario to the East Ditch and evaluation of ecological risks contained in Appendix B of the OU1/OU2 draft FS.
2. EPA needs to determine if an evaluation of the potential human health risks from trespassers or MBTA workers in the East Ditch is also warranted.
3. EPA needs to determine if any OU3 data gaps exist in the Plant B area.
4. EPA needs to determine if additional receptors beyond the East Ditch may be present.
5. EPA intends to issue a proposed plan for an interim action focused on source control (including addressing DAPL and highly contaminated groundwater) in the near future, which would also incorporate any changes to the operation of Plant B. Any proposed changes to the operation of Plant B should be subject to the public review process associated with the proposed plan.

Please let me know if you have any questions.

Sincerely,



James M. DiLorenzo  
Remedial Project Manager  
USEPA Region 1 - New England

Cc: Lynne Jennings, EPA  
Rick Sugatt, EPA  
Chris Smith, EPA  
Melanie Morash, EPA  
Kevin Pechulis, EPA  
John Kilborn, EPA  
Jeff Burnell, Nobis  
Garry Waldeck, MassDEP  
Jeff Hull, Wilmington  
Martha Stevenson, WERC